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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Jointly Administered
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

NOTICE OF HEARING

PLEASE TAKE NOTICE that by May 19, 2015 the above-captioned debtors (the "Debtors") had filed, among other items, the following motions in connection with these chapter 11 cases:

- a) Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the "Interim Compensation Procedures Motion") [Docket No. 113];
- b) Application to Employ Gibbs & Bruns, L.L.P. as Special Litigation Counsel (the "Gibbs & Bruns Retention Application") [Docket No. 118];
- c) Application of the Debtors Authorizing Them to Retain and Employ Jones Day as Counsel, Nunc Pro Tunc to the Petition Date (the "Jones Day Retention Application") [Docket No. 119];

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

- d) Motion of the Debtors for an Order Authorizing the Retention and Payment of Professionals Utilized by the Debtors in the Ordinary Course of Business (the "OCP Motion", and together with the Interim Compensation Procedures Motion, the Jones Day Retention Application, the Gibbs & Bruns Retention Application, the "Filed Motions") [Docket No. 120].

PLEASE TAKE FURTHER NOTICE, that on May 6, 2015 the Court entered an order [Docket No. 50] granting relief on an interim basis regarding the Motion of the Debtors for an Order (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Permitting Certain Intercompany Transactions and Setoffs and (III) Granting Related Relief (the "Cash Management Motion") [Docket No. 6].

PLEASE TAKE FURTHER NOTICE, that on May 7, 2015 the Court entered an order [Docket No. 55] granting partial relief regarding the Application of Debtors for an Order Authorizing the Appointment of Epiq Bankruptcy Solutions, LLC as Claims, Noticing and Balloting Agent (the "Claims Agent Application") [Docket No. 8].

PLEASE TAKE FURTHER NOTICE, that a hearing to consider (a) the relief requested in the Filed Motions; (b) final relief regarding the Cash Management Motion; and (c) the remaining relief regarding the Claims Agent Application will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **June 9, 2015 at 11:00 a.m. (CDT)**, or at such other time as the court may determine.

PLEASE TAKE FURTHER NOTICE that any objections or other responses (collectively, "Objections") must be filed on or before **June 2, 2015** (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve a copy of the Objection upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment

[Docket No. 61]. Objections must be so served so as to actually be received by the parties on the Service List by the Objection Deadline.

Dated: May 19, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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